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Via ECF

Honorable Victor Marrero
United States District Judge
500 Pearl Street
New York, NY 10007

December 30, 2022

Re: *United States v. Marutyan, et. al.*, 20 Cr. 652 (VM),

Dear Honorable Judge Marrero:

I along with Harvey Fishbein represent Vahe Hovhannisyan in the above referenced case. I write to ask for an emergency modification of Mr. Hovhannisyan travel restrictions. Mr. Hovhannisyan has learned that his California driver's license must be replaced by a Texas driver's license. According to Mr. Hovhannisyan there are no appointments through Dallas area DMV for several weeks, however, he was able to obtain an appointment through the Houston DMV on January 3, 2023. He has reached out to his PreTrial Officer to ask permission to travel to Houston on January 3, by car with another driver returning home that same day. However, the officer is away until January 4 and a supervisor in the office has said that Mr. Hovhannisyan needs Court approval. Accordingly, Mr. Hovhannisyan respectfully requests permission to travel on January 3, 2023 from his home in the Dallas area to Houston and back to the Dallas area on the same day.

Request GRANTED. Defendant's bail conditions are modified to authorize travel from Dallas, TX to Houston, TX on January 3, 2023 for the purpose and on the terms and conditions specified above.

SO ORDERED.

12/30/2022

DATE



VICTOR MARRERO, U.S.D.J.

Sincerely,

/s/ Lauren Di Chiara

Lauren Di Chiara

Associate Counsel for the Defendant
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